

INTERNATIONAL MILITARY TRIBUNAL  
FOR THE FAR EAST

*Read by  
the  
Hon'ble  
Panel*

THE UNITED STATES OF AMERICA, et al,

vs

ARAI, Sadao, et al,  
Defendants.

REQUEST FOR PRODUCTION OF WITNESSES

Comes now K.Y.A. Okinori, and requests the Tribunal, in accordance with Section III, Article 9(e) of the Charter, to order the production of the following witnesses necessary to his defense:

- (a) KOBAYASHI, Seizo, Sugamo Prison, Tokyo.
- (b) IWAMURA, Michiyo, Sugamo Prison, Tokyo.
- (c) GODO, Takuo, Sugamo Prison, Tokyo.

(a) Witness KOBAYASHI, Seizo, as former Admiral and former President of the Imperial Rules Political Assistance Association will be able to testify regarding the attitude of the accused with reference to carrying on negotiations with the United States, and his opposition to waging war against the United States. This testimony will be relevant in relation to the charge of conspiracy in the Indictment and other charges therein. The witness will also testify to the fact that the connection of the defendant with the IRPA was in name only; that he did not actually participate in the Association; further, that the accused attended with the defendant the Geneva Disarmament Conference in 1927 and exerted efforts in concluding the Disarmament Agreement.

(b) Witness IWAMURA, Michiyo, former Minister of Justice in the Tojo cabinet, will be able to testify to the action of the Prime Minister, the Foreign Minister and the Naval Minister in relation to entering into war with the United States and the British Empire, and the fact that the defendant did not participate in the discussion thereof. This testimony is relevant in regard to the charges of conspiracy and other counts of the Indictment.

(c) Witness GODO, Takuo, will testify as to the action and conduct of the defendant in relation to his activities as President of the North China Exploitation Company; that in 1939 when the great flood damaged the Peiping-Tientsin area the accused made every effort to save the people in the local districts and to rehabilitate them; that he asked the witness, in his official capacity, to send material and otherwise to help the people of North China. This testimony will be relevant in relation to the charge of planning and preparing the Japanese economic aggression against North China.

Dated November 7, 1946.

K.Y., Okinori

By

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T.L. MO, Tsuruo

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R. S. RUTCHICK

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MICHAEL LEVIN